REMARKS

This amendment is responsive to the Office Action dated December 27, 2004. Applicant has amended claims 34-39 and added new claims 40-42. Claims 1-42 are pending upon entry of this amendment.

Claim Rejection Under 35 U.S.C. § 112

In the Office Action, the Examiner rejected claims 34-39 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant has amended claims 34-39 for purposes of clarification that are unrelated to patentability of the claims. Applicant submits that the claims, as amended, particularly point out and distinctly claim the subject matter, as required by 35 U.S.C. 112, second paragraph, and request that this rejection be withdrawn.

Provisional Rejection for Obviousness-type Double Patenting:

The Examiner also provisionally rejected claims 1-5, 10, 12-16, 21, 23-27, 32, 34-39 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1, 3-7, and 11 of commonly owned U.S. Patent Application No. 09/871,458 in view of US Patent 6,640,241 issued to Ozzie et al. Applicant respectfully traverses this rejection. As a preliminary matter, Applicant notes the provisional status of this rejection. Nevertheless, in order to expedite prosecution, Applicant will address the merits of the rejection as if formally applied.

Applicant respectfully submits that the Examiner has not established a prima facie case of obviousness-type double patenting. In the Office Action, the Examiner correctly acknowledged that copending Application No. 09/871,458 fails to describe a management server module that, in response to a selection made by a user, emits encoded replies for presentation in either a rendered or unrendered format. However, the Examiner asserts that Ozzie describes such a management server module.

In general, Ozzie describes a communications manager that provides communication services for an activity-based collaboration system. More specifically, Ozzie describes a

distributed computer-based system for coordinating and otherwise maintaining data pursuant to a distributed data model. Contrary to the Examiner's assertion, Ozzie fails to teach or suggest a management server module that, in response to a selection made by a user, emits replies encoded in an extensible markup language for presentation in either a rendered or unrendered format. The section of Ozzie relied upon by the Examiner merely describes a conventional system 200 that stores data in accordance with a data model. The Ozzie system does not even produce replies encoded in an extensible markup language, let alone encoded replies that a client may present in either a rendered or unrendered format

It appears that the Examiner may have misinterpreted these elements of Applicant's claims. For purposes of clarification, the Applicant refers the Examiner to an example described within the present application that illustrates presentation of XML encoded replies by a client in either rendered or unrendered format:

> *The reply from management server module 32 for the operational request described above provides reply tags for all of the request tags, as specified by XML API 44. ...The following sample reply includes information about the interface called "ge-2/3/0":*
>
>   *<rpc-reply>*
>   *<interface-information>*
>   *<interface-name>ge-2/3/0</interface-name>*
>   *<interface-index>20</interface-index>*
>
>   *.*
>   *.*
>   *.*
>
>   *</interface-information>*
>   *</rpc-reply>*
>
> *In this example, each reply provided by management server module 32 includes the opening and closing tags <rpc-reply> and </rpc-reply>. Note that a large number of child tags may be included in the reply, as indicated by the ellipsis above.*
>
> *The client application associated with a client 46, 48, 50 is configured to accept user input that specifies whether the XML reply from management server module 32 should be rendered or presented in an unrendered format. If rendered output is desired, the above reply could be displayed in any graphical or textual format as follows:*
>
> *Interface Name: ge-2/3/0*
> *Interface Index: 20*
>
>   *.*
>   *.*
>   *.*

> *If unrendered output is desired, however, the client application simply presents the*
> *raw XML output communicated by management server module 32 as follows:*
> <rpc-reply>
>   <interface-information>
>   <interface-name>ge-2/3/0</interface-name>
>   <interface-index>20</interface-index>
>
>   .
>   .
>   .
>
>   </interface-information>
> </rpc-reply>
> *The user may enter a command that selects one of the presentation modes.* [1]

As illustrated in this example, the client may process the XML encoded replies and display a textual or graphical interface without displaying the extensible markup language tags used to encode the replies when the user selects rendered form. Alternatively, the client may display raw output that includes both the replies and the extensible markup language tags used to encode the replies when the user selects unrendered form. In some embodiments, the management server module includes an instruction with the encoded replies to instruct the client interface not the render the encoded replies that follows the instruction. Ozzie fails to teach or suggest any of these features.

Consequently, contrary to the Examiner's assertion, Ozzie does not describe a management server module that emits replies encoded in an extensible markup language for presentation in either a rendered or unrendered format, as required by Applicant's independent claim 1. Similarly, with respect to independent claims 12 and 23, Ozzie fails to teach or suggest emitting the replies for presentation in either a rendered or unrendered format in response to a selection made by a user.

Applicants respectfully submit that the Examiner has failed to set forth evidence on the record that establishes a prima facie case of obviousness-type double patenting. Consequently, the provisional double-patenting rejection with respect to this referenced application should be withdrawn.

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[1] Pg. 10, ln 21 – pg. 11, ln 30 (emphasis added).

Claim Rejection Under 35 U.S.C. § 103

In the Office Action, the Examiner rejected claims 34-39 under 35 U.S.C. 103(a) as being unpatentable over Bixler et al. (USPN 6,212,559) in view of Anderson et al. (6,510,434). Applicant respectfully traverses the rejection to the extent such rejections may be considered applicable to the claims as amended. The applied references fail to disclose or suggest the inventions defined by Applicant's claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

For example, with respect to claim 34, neither Bixler or Anderson teach or suggest a client interface that receives replies encoded with extensible markup language tags from a network router, and a management server module of the network router that emits the replies to the client interface for presentation to a user in either a rendered or unrendered form in response to a selection made by the user.

In general, Bixler describes a system for automatically configuring or reconfiguring a large interconnected computer network. In particular, a network management tools provides a graphical interface for locally defining configuration information. This configuration information is then "disseminated" to computers within the network. In particular, Bixler states:

> *In the dissemination phase 32, data from the network operational database 46 are transmitted to the network computers, as indicated in block 50, together with management information blocks 48. Transmission is made in a standard format recognizable by computers in the network, such as the simple network management protocol (SNMP). SNMP was designed to facilitate monitoring of network bridges and routers, but the same protocol is used in the present invention to control and program bridges and routers in accordance with a new configuration.*

Bixler fails to describe any form of a "reply" from the devices being configured. Thus, contrary to the Examiner's assertion, Bixler does not describe a management system that emits encoded replies to a client interface for presentation to a user in either a rendered or unrendered form in response to a selection made by the user, as required by claim 34. As described in detail above, the present application describes a client interface that may present the encoded replies in one of two forms: rendered or unrendered. For example, the client interface may process the XML encoded replies and display a textual or graphical interface without displaying the extensible markup language tags used to encode the replies when the user selects rendered form. Alternatively, the client may display raw output that

displays the raw XML received from the client device, i.e., the replies and the extensible markup language tags used to encode the replies, when the user selects unrendered form.

Anderson describes fails to address any of these deficiencies of Bixler. In general, Anderson describes a system for retrieving data from a database using an index of XML (eXtensible Markup Language) tags and is unrelated to Applicant's claims. The Examiner appears to cite Anderson merely based on the fact that Anderson describes the use of XML tags. Like Bixler, Anderson fails to describe replies produced during the configuration of a network device, let alone a management system of a network router that emits replies to a client interface for presentation to a user in either a rendered or unrendered form in response to a selection made by the user, as required by claim 34.

For at least these reasons, Bixler and Anderson fail to teach or suggest transmitting configuration requests and operational requests encoded with extensible markup language tags from a client device to a network router, receiving with the client device replies encoded with extensible markup language tags from the network router, and presenting with the client device the replies to a user in either a rendered or unrendered form in response to a selection made by the user, as required by Applicant's claims 35 and 36.

Similarly, Bixler and Anderson fail to teach or suggest a system that includes a management server module that accesses information associated with software modules, and emits replies according to a schema, wherein the management server emits the replies for presentation in either a rendered or unrendered form in response to a selection made by the user, as required by Applicants claim 37. Neither Bixler nor Anderson even describe replies produced by the devices being configured, let alone a management system that emits replies to a client interface for presentation to a user in either a rendered or unrendered form in response to a selection made by the user.

For similar reasons, Bixler and Anderson fail to teach or suggest accessing a schema that maps the tags to configuration and operational information associated with a chassis module, a device configuration module, and a routing protocol module running on a network router, as required by claims 38 and 39. Further, neither Bixler nor Anderson teach or suggest emitting replies encoded with extensible markup language tags from the network device to a client according to the schema; and presenting the replies to a user in either a

rendered or unrendered form with the client in response to a selection made by the user, as further required by claims 38 and 39.

For at least these reasons, the Examiner has failed to establish a prima facie case for non-patentability of Applicant's claims 34-39 under 35 U.S.C. 103(a). Withdrawal of this rejection is requested.

New Claims:

Applicant has added claims 40-42 to the pending application. The applied references fail to disclose or suggest the inventions defined by Applicant's new claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed inventions.

As one example, the applied references fail to disclose or suggest the management server module that includes an instruction with the encoded replies to instruct the client interface not the render the encoded replies that follows the instruction, as recited by new claim 40.

As another example, the applied references fail to teach or suggest a client interface that presents the replies in rendered form by displaying text or graphics without displaying the extensible markup language tags used to encode the replies, wherein the client interface presents the encoded replies in unrendered form by displaying raw output that displays both the replies and the extensible markup language tags used to encode the replies, as recited by new claim 41.

Similarly, the applied references fail to teach or suggest displaying with a client device text or graphics without displaying the extensible markup language tags used to encode the replies when the user selects rendered form, and displaying with the client device both the replies and the extensible markup language tags used to encode the replies when the user selects unrendered form, as recited by new claim 42.

No new matter has been added by the new claims. Support for the new claims can be found throughout the present specification. For example, with respect to new clam 40, pg. 10, ll. 6-10 of the present application states:

In particular, management server module 32 may included the built-in command with the router output, instructing the CLI client application 46 not the render the XML output that follows the command. This "do not render" mode may continue until the end of the output emitted by management server module 32, i.e., the end of an rpc reply.

Allowable Subject Matter

In the Office Action, the Examiner indicated that claims 1-33 would be allowable if the double patenting rejection is overcome. The Applicant agrees with the Examiner's conclusion. Applicant has addressed the double patenting rejection above.

CONCLUSION

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

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By:

March 18, 2005

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